

EXHIBIT A

Dickinson Decl.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10063 (SHL)

Jointly Administered

**DECLARATION OF JAMES DICKINSON IN SUPPORT OF
CLAIMANT TAFL'S RESPONSE TO DEBTORS' NON-SUBSTANTIVE OBJECTION
TO CLAIM NOS. 323, 324, 325, 468, 488, AND 502**

I, James Dickinson, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am an associate at the law firm Pillsbury Winthrop Shaw Pittman LLP, counsel to claimants Paul Pretlove, David Standish, and James Drury, the duly appointed joint liquidators of Three Arrows Fund, Ltd (In Liquidation) in the above-captioned chapter 11 case.

2. I respectfully submit this declaration in support of *Claimant TAFL's Response to Debtors' Non-Substantive Objection to Claim Nos. 323, 324, 325, 468, 488, and 502*.

3. I prepared **Charts 1-6** in the Response, which provide visual representations of certain data contained in the Genesis-TACL Loan History.

4. A true and correct copy of the Verified Petition for Recognition of Foreign Main Proceeding and for Related Relief Under Chapter 15 of the Bankruptcy Code, and Memorandum of Law In Support Thereof, *In re Three Arrows Fund, Ltd (In Liquidation)*, Case No. 24-10210 (MG) (Bankr. S.D.N.Y.), ECF No. 7 is attached as **Exhibit A-1**.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's tax identification number (as applicable), are: Genesis Global Holdco, LLC (8219) ("GGH"); Genesis Global Capital, LLC (8564) ("GGC"); Genesis Asia Pacific Pte. Ltd. (2164R) ("GAP"). For purposes of these chapter 11 cases, the service address for the Debtors is 175 Greenwich Street, Floor 38, New York, NY 10003.

5. A true and correct copy of the Witness Statement of Arianna Pretto-Sakmann, *In the Matter of the Arbitration of a Certain Controversy Between Genesis Asia Pacific Pte. Ltd. Against Three Arrows Capital Ltd*, Arbitration No. 01-22-0003-5568-1-MS, produced by the Debtors with Bates labels GENESIS_3AC_BVI_00000669 – GENESIS_3AC_BVI_00000683 is attached as **Exhibit A-2**.

6. A true and correct copy of the letter from John Pintarelli to Judge Martin Glenn dated March 4, 2024 is attached as **Exhibit A-3**.

7. A true and correct copy of the TAFL Claim Form and Explanatory Note in TACL's BVI liquidation proceeding is attached as **Exhibit A-4**.

8. A true and correct copy of the spreadsheet, without modifications, produced by the Debtors with Bates filename GENESIS_3AC_BVI_00000958 with all rows and columns visible is attached as **Exhibit A-5**.

9. A true and correct copy of the spreadsheet, truncated and reformatted to show only columns relevant to this matter, produced by the Debtors with Bates filename GENESIS_3AC_BVI_00000958 with all rows visible and all columns visible, except columns A, B, D, and I-AL, is attached as **Exhibit A-6**.

10. A true and correct copy of the Declaration of Russell Crumpler in Support of Verified Petition Under Chapter 15 for Recognition of a Foreign Main Proceeding and Related Relief, *In re Three Arrows Capital, Ltd*, Case No. 22-10920 (MG), (Bankr. S.D.N.Y.), ECF No. 3 is attached as **Exhibit A-7**.

11. A true and correct copy of the Chapter 15 Petition for Recognition, *In re Three Arrows Fund, Ltd (In Liquidation)*, Case No. 24-10210 (MG) (Bankr. S.D.N.Y.), ECF No. 1 is attached as **Exhibit A-8**.

12. A true and correct copy of the Order Granting Recognition and Relief in Aid of a Foreign Main Proceeding, *In re Three Arrows Fund, Ltd (In Liquidation)*, Case No. 24-10210 (MG) (Bankr. S.D.N.Y.), ECF No. 32 is attached as **Exhibit A-9**.

13. A true and correct copy of the Verified Petition Under Chapter 15 for Recognition of a Foreign Main Proceeding and Related Relief, *In re Three Arrows Capital, Ltd*, Case No. 22-10920 (MG), (Bankr. S.D.N.Y.), ECF No. 2 is attached as **Exhibit A-10**.

Dated: May 31, 2024
Houston, Texas

Respectfully submitted,

/s/ L. James Dickinson

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*Attorney for Paul Pretlove, David Standish and
James Drury, in their capacities as Joint Liquidators
of Three Arrows Fund, Ltd (In Liquidation)*